

ADT, LLC,	)	
	)	
	)	
v.	)	NLRB Cases 18-CA-264654
	)	18-CA-266951
INTERNATIONAL BROTHERHOOD OF	)	18-CA-270402
ELECTRICAL WORKERS LOCAL UNION	)	
364.	)	
	)	
	)	

COMES NOW ADT, LLC (“ADT”), pursuant to Section 102.46 of the Board’s Rules and Regulations, and moves for a twenty-one (21) day extension of time to file Exceptions to the Judge’s Decision and Brief in Support of the Exceptions in this case, on the following grounds:

- <sup>1</sup> Respondent's counsel filed this Motion with Region 18 on April 13, 2021. Today, April 20, Respondent called the office of the Executive Secretary to inquire as to the status of this Motion, and was made aware of their mistake in filing with the Region instead of the Board. As soon as counsel discovered this mistake, they re-filed this Motion with the Board.

4. Respondent's counsel is currently engaged in negotiations, oral argument, and hearings taking place on or around the current deadline of April 26, 2021.

5. Due to professional commitments of Respondent's counsel, additional time is required to prepare and file exceptions in this case.

6. Counsel is engaged in ongoing negotiations with Automobile Mechanics' Local 701 which are currently scheduled to take place on April 16, 20, and 22, with further negotiations to be scheduled around April 26. See *NLRB v. Zeigler Lincolnwood, et al.*, Case No. 21-1432.

7. Counsel is preparing to represent ADT as an intervenor in oral argument in the Second Circuit on Friday, April 23. See *IBEW Local 43 v. NLRB*, Case No. 03-CA-184936.

8. Counsel has an arbitration preparation date scheduled for April 26 for Innophos regarding a contract interpretation grievance. The hearing is set to take place on May 6.

9. Counsel has an arbitration preparation date scheduled for April 30 and May 3 for US Silica regarding a grievance filed by Quay Younker. The hearing is set to take place on May 4.

10. Yesterday, April 12, Counsel completed and filed a post-hearing brief following arbitration with arbitrator Gill Vernon over a grievance filed by UNITE HERE Local 1 against Levy Restaurants, which further delayed his ability to prepare exceptions.

11. Due to professional commitments of Respondent's counsel all falling on or around April 26, additional time is required to prepare and file exceptions in this case. Respondent has endeavored to file exceptions within the time period allotted, but will not be able to do so.

12. Respondent presents this Request in good faith to permit the proper and diligent preparation and filing of Exceptions with the Board.

13. This extension will not cause delay or prejudice to any party to this case, nor will it impede the Board's consideration of the matter.

WHEREFORE, ADT, Respondent herein, respectfully requests an extension of twenty-one (21) days, to and including May 17, 2021, within which to file its Exceptions to the Decision of the Administrative Law Judge and Memorandum of Law in support.

Respectfully submitted,

/s/ Jeremy C. Moritz  
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*Attorneys for ADT, LLC*

Dated: April 20, 2021

## **CERTIFICATE OF SERVICE**

I certify that, pursuant to Section 102.114 of the Board's Rules and Regulations, on this 20th day of April, 2021, I caused a copy of MOTION FOR EXTENSION OF TIME TO FILE EXCEPTIONS TO JUDGE'S DECISION AND BRIEF IN SUPPORT OF EXCEPTIONS to be served on the Charging Party via regular mail and electronic mail sent to the following individual and addresses:

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